

Global Communications

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June 10, 2005

Darlene Standley  
Chief, Utilities Division  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

**Re: Docket No. 05-00113, Petition of Xspedius Management Co. Switched Services, LLC For Expedited Review of Central Office Code Denial**

Dear Ms Standley,

j2 Global Communications, Inc ("j2") is seeking to expand its signature eFax® service to provide new competitive services to Tennessee's consumers. eFax® allows individuals and businesses to send and receive faxes using the Internet rather than traditional fax machines, which makes faxing more secure and convenient, in addition to avoiding paper jams and saving ink and toner expense. j2 currently offers the eFax® service to over 500,000 individuals and businesses in more than 1,500 cities and 25 countries.

In response to your May 2, 2005, request for additional information regarding Xspedius' request on our behalf for telephone numbers (DIDs) in Tennessee, please consider the following answers to your questions:

**1. Provide a copy of j2's registration with the office of the Secretary of State for Tennessee.**

Because j2 has no employees or facilities in Tennessee, and because it transacts its business in interstate commerce, j2 is not required to register with the office of the Secretary of State for Tennessee. See 48-25-101(b), (11).

**2. Identify specifically where j2 is providing, or is planning to provide, service in Tennessee. Identify the specific rate centers.**

Initially, we plan to provide eFax® service in the Memphis and Nashville market areas, which include the rate centers of Memphis, Nashville, Murfreesboro and Franklin. We would provide the option for residents of Memphis, Nashville, Murfreesboro and Franklin to have local numbers so that senders could send them a fax without making a long distance call.

**3. Explain why, other than the cost of porting telephone numbers, j2 cannot use one-thousand blocks of numbers for its start-up, or expansion, business plans.**

j2 observes a proactive reclaiming process for our DIDs. However, as of May 9, 2005, j2 is provisioning a net average of approximately 1,000 DIDs a day or 30,000 DIDs per month throughout the United States. An NXX in Memphis will last approximately 2 to 3 months and we will not be able to serve Tennessee end users in the Nashville, Murfreesboro and Franklin rate centers because we will run out of numbers so quickly that we will not be able to obtain additional number in time, therefore, our customers and your constituents would not be served.

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Additionally, j2 would like to have an entire NXX from which to provision our services. Not only does this provide cost savings should it become necessary to change providers, but it also facilitates contiguous number allocation and more efficient long-term maintenance of the numbers allocated to j2.

Lastly, while j2 has no plans to port numbers from Xspedius to another carrier, if it ever were to become necessary for j2 to change providers, the cost and potential confusion to port non-sequential numbers is cost prohibitive and inefficient and could ultimately result in loss of service for Tennessee eFax® customers

4. **For the rate centers identified in item 2 above, provide documentation showing a need for 10,000 telephone numbers upon initial offerings.**

Since j2 is planning to initiate service to Memphis, Nashville, Murfreesboro and Franklin once we receive an adequate supply of numbers from the TRA, there is no documentation to show a historical usage pattern for those rate centers yet. However, as is detailed in our answer to question 5 below, our history has been that we use tens of thousands of numbers per month.

5. **If j2 is currently providing service, provide documentation showing a need for 10,000 telephone numbers for its expansion of business in each of the rate centers identified above.**

j2 is currently providing service in various markets throughout the United States. Specifically, on May 5, 2005, j2 received 30,000 telephone numbers in Toledo, Ohio. At the end of May 23, 2005, j2 already utilized 99.3% of those numbers.

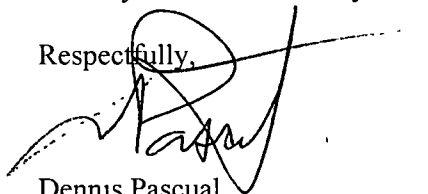
6. **Please provide information detailing how number porting from j2's service provider, Xspedius, to j2, the customer, is appropriate.**

As stated above, j2 currently has no plans to port numbers from Xspedius to another carrier. If it ever were to become necessary for j2 to change providers, the cost and potential confusion to port non-sequential numbers is cost prohibitive and inefficient and could ultimately result in loss of service for Tennessee eFax® customers.

In conclusion, j2 requests and needs at least 10,000 numbers in at least 3 of the 4 Nashville rate centers identified above to accommodate requests for service from end users upon our initial offering. According to the Census Bureau's 2000 census, the combined population of Nashville, Murfreesboro and Franklin is more than 645,000. Three NXXs or 30,000 numbers correlates to only 4% of the population. In sum, Tennessee's residents are excited to begin receiving our competitive service and we need these numbers in order to provide them the benefits of eFax® in a timely manner.

Thank you in advance for your consideration of this important matter.

Respectfully,



Dennis Pascual  
Director of Telecommunications

cc Pamela Rak (Xspedius Legal Dept)

APPROVED  
j2 legal

